



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

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Brooklyn, New York 11201*

December 8, 2023

By ECF

The Honorable Eric R. Komitee
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Joshua Adam Schulte v. Warden of Metro. Detention Ctr.*,
Civ. Action No. 22-cv-766 (Komitee, J.)

Dear Judge Komitee:

This Office represents Respondent Warden of the Metropolitan Detention Center (“MDC Brooklyn”) in the above-referenced action in which Petitioner Joshua Adam Schulte, who is currently incarcerated at MDC Brooklyn, has filed a habeas corpus petition (“Petition”) pursuant to 28 U.S.C. § 2241. ECF No. 1. The Court held an evidentiary hearing in this matter on September 5, 2023, and directed the parties to submit post-hearing submissions in the form of proposed findings of fact and conclusions of law. *See* Hr’g Tr. 16:3-5; Sept. 5, 2023 Minute Entry. The Government respectfully submitted its proposed findings of fact and conclusions of law in compliance with that directive under separate cover, along with Petitioner’s supplemental submission in support of his writ of habeas corpus, as well as a copy of a yet-to-be-signed declaration from Petitioner. *See* ECF No. 50. The Government respectfully awaits the Court’s decision with respect to proposed redactions to the documents referenced in those filings.

Petitioner also included in his submission: (1) the Declaration of Keegan Stephan; and (2) the latest version of the Special Administrative Measures (“SAMs”) applicable to Petitioner, attached as Exhibit 2 to the Keegan Declaration. *See also* ECF No. 48. The Government has not requested redactions to those documents, and pursuant to the parties’ agreement, the Government respectfully submits them for the Court’s consideration in this filing.

Respondent thanks the Court for its consideration of this matter.

Respectfully submitted,

BREON PEACE
United States Attorney

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Encl.

cc: **By ECF**
Keegan Stephan (*Counsel for Petitioner*)